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The citizens of Portland and the state of Oregon have waited sixteen years for the EPA to reveal a plan to clean-up one of the most egregious Superfund sites in the United States: The Portland Harbor Superfund Site.

In my view, the EPA proposed clean-up plan, Alternative I, falls short in several areas:

1. it does not adequately address the pollution in the Portland Harbor nor does it provide the level of risk reduction essential to protecting human health and the environment.
2. It is of utmost importance to adopt and implement a thorough cleanup plan for the Portland Harbor that, in addition to removing toxic substances, will have effective, permanent long-term results and reduce the possibility that additional action will be needed in the future.
3. There should be less reliance on the EPA-proposed level of capping and Monitored Natural Recovery (naturally occurring processes that reduce contamination) and more emphasis on removing contaminated sediment.
4. Contaminated sediments must be stored offsite in certified toxic waste disposal facilities.
5. Providing for long-term monitoring is essential 6. The EPA and Oregon Department of Environmental Quality should establish a common agreement on how to measure the success of the plan that is adopted.

I think that going back and resolving some of the issues now will be cost effective in the long run. With as many as 150 PRP's, having to go back if Plan I is inadequate will be nearly impossible. We need a plan that will ultimately clean-up our river to levels that sustain human health and safety.

After 100 years, the citizen's of Oregon deserve this consideration.